DUPLICATE

002-02

USEPA — WORK ASSIGNMENT FORM

1. WORK ASSIGNMENT INFORMATION

Project Name: Sauget Area 1 & 2 Contractor: Ecology & Environment Work Assignment No.: 47-5N60

Activity: TA EPA Contract No.: 68-W8-0086 Revision No.: 01

Date: July 23, 1997 Contractor Control No.: _____ Modification No. N/A
(Contracting Officer Use Only)

2. DESCRIPTION OF ACTION

[ ] New Work Assignment	[X] Interim Amendment	[ ] Partial Work Plan Approval [ ] Final Work Plan Approval	[ ] Technical Direction Memorandum	[ ] Work Assignment Completion Notification (No Attachment)
. Interim SOW, schedule, and LOE . Complete SOW, estimated budget and schedule	. Change in LOE, Scope by task . Add additional tasks of funds [ ] Incremental Funding	. Approval of work plan . Add funds [ ] Amendment to Final Work Plan Approval . Change in LOE, scope of budget by task . Add additional tasks or funds	. Detailed scope, budget and schedule . Revise expenditure level . Minor shift within SOW (All changes must be with overall scope, budget and LOE approved by EPA CO)	. Contractor originates . Regional determination . When signed by CO, this constitutes a stop work order

3. BUDGET INFORMATION

	Total Funding received ($)*	Interim Budget (IB) Technical LOE	Interim Budget (IB) ($)*	Approved Work Plan Budget Technical LOE	Approved Work Plan Budget ($)*	Expenditure Limit (EL)* Technical LOE	Expenditure Limit (EL)* ($)*
Current	170,000	100	10,000	0	0	100	10,000
This Action	0	100	10,000	0	0	100	10,000
Total	170,000	200	20,000	0	0	200	20,000
	* Includes fees		* Includes fees		* Includes fees		* Established by WAM/PO

4. WA COMPLETION DATE

Current: November, 1997 Revised: February 1998

5. EPA COMMENTS:

The contractor shall prepare a work plan in accordance with the revised Statement of Work dated July 23, 1998.

6. APPROVALS

Contractor Signatures:

Site Manager/Firm — Date: 7/25/97

Regional Manager/Firm — Date: 7/25/97

EPA Signatures:

Work Assignment Manager, Leah Evison — Date: 7/23/97

Phone (312) 886-4696

Project Officer, Pat Vogtman — Date: 7/23/97

[X] Approved As Submitted [ ] Approved With Changes [ ] Not Approved

Signature of Contracting Officer, Peggy Hendrixson — Date Approved: 7/25/97

cc: 1. EPA PO 2. WAM 3. EPA CO

STATEMENT OF WORK FOR TECHNICAL DATA COMPILATION
Sauget Area 1, Sauget/Cahokia, Illinois

Statement of Work Revision No 1
July 23, 1997

Introduction

This Statement of Work describes the requirements for a work assingment for the Sauget Area 1 Superfund Site in Sauget and Cahokia, Illinois.

Description of Sites

The Sauget Area 1site is located in and around the villages of Sauget (formerly Monsanto) and Cahokia in west-central St. Clair County, Illinois.

Sauget Area 1 is composed of segments A through F of Dead Creek, and adjacent Sites G, H, I, L, and M. Dead Creek is an intermittent creek, sometimes impounded, which, was formerly used for waste disposal. The creek segments included in the Site stretch over 3.5 miles. The Creek runs south and southwest through Sauget and Cahokia to an outlet in the old Prairie DuPont Creek floodway, located south of Cahokia. The floodway in turn discharges to the Cahokia Chute of the Mississippi River. Site G, H, and I are inactive landfills or former subsurface/surface disposal areas adjacent to Dead Creek. Site L is the location of a former surface impoundment used by a hazardous and special waste hauler to dispose of wash water from truck cleaning operations. Site M is former sand pit immediately adjacent to Dead Creek.

The Sauget Area 1 Site has been investigated extensively by the Illinois EPA, it's contractors, and by private parties. U.S. EPA, Illinois EPA, and private parties have undertaken protective actions such as fencing of the most highly contaminated portions of the site. Recent history includes the remediation of Dead Creek Segment A by Cerro Copper Products, Inc., in 1990, following the signing of a Consent Decree with the Illinois EPA. Cerro removed over 22,000 cubic yards of contaminated creek sediment. In 1995, U.S. EPA conducted an extensive investigation of the Site G landfill and the surrounding area following an underground fire at Site G. After the investigation, the Agency consolidated contaminated wastes on-site and placed a soil cover over the landfill.

The Sauget Area 1 Site contains high levels of chlorobenzenes, chlorophenols, chloroanilines, nitroanilines and PCBs. The most highly contaminated parts of the Site are fenced or covered by pavement or slag. U.S. EPA proposed the Sauget Area 1 Site to the National Priorities List in June of 1996.

In order to fulfill this work assignment for the Sauget Area 1 Site, it is necessary to include techical and PRP data complilation work relating also to the Sauget Area 2 pre-NPL Site. This work is necessary to effectively do the work on Sauget Area 1 because data compiled on the known activities of the PRPs in Area 2 will be used to better link those PRPs to activities in Area 1.

The Sauget Area 2 Site is composed of Sites O, P, Q, R, and S, as described below. Other adjacent areas may be added as the investigation continues. Site O contains four inactive sludge dewatering lagoons. Site P, Q and R are inactive landfills. Site S is a disposal area for still bottom sludges and chlorinated solvests located near Site O. In 1995, U.S. EPA removed 13 drums and 297 tons of PCB contaminated soil eroding out of Site Q immediately adjacent to the Mississippi River. Site R was capped by Monsanto Corporation in 1979. Based on visual observations, Site Q and R have a long history of leachate flow into the Mississippi River. In addition to the same types of contaminants found in the Sauget Area 1 sites, some parts of Area 2 contain high levels of chlorinated solvents. The Illinois EPA and U.S. EPA anticipate that the Sauget Area 2 Site will be proposed to the National Priorities List early in 1998.

Purpose

The purpose of this Statement of Work (SOW) is to set forth the requirement for providing a Technical Data Compilation to help U.S. EPA, and indirectly the State of Illinois, in enforcement, cleanup oversight, and cost recovery efforts at the Sauget Area 1 and Sauget Area 2 Sites, specifically, to compile and summarize existing technical and PRP data for each subunit within the sites. The estimated completion date for this work assignment is December 30, 1997. The purpose of SOW Revision 1 is to clarify the original SOW based on discussions during the July 23, 1997 kick-off meeting.

General Requirements

The contractor shall conduct the work in accordance with this SOW and all other relevant guidance used by U.S. EPA. The primary contact for this work assignment is Leah Evison, Tel. (312) 886-4696, Email: evison.leah@epamail.epa.gov.

A summary of the major deliverables and a suggested schedule for submittals are attached (Attachment 1).

Specifically, this work assignment involves the investigation and study of existing data housed at U.S. EPA Region 5, Illinois EPA, and possibly at other locations in Sauget or Cahokia, Illinois, or St. Louis, Missouri.

The contractor shall furnish all necessary and appropriate personnel, materials, and services needed for, or incidental to, performing and completing the work assignment.

A list of primary guidance and reference material is attached (Attachment 2). In all cases, the contractor shall use the most recently issued guidance.

The contractor shall communicate at least weekly with the Work Assignment Manager or Remedial Project Manager (WAM/RPM), either in face-to-face meetings or through conference calls.

The contractor shall notify the WAM/RPM when 75 percent of the approved work assignment budget has been expended and when 95 percent has been expended.

EPA will provide oversight of contractor activities throughout the project. EPA review and approval of deliverables is a tool to assist this process and to satisfy, in part, EPA's responsibility to provide effective protection of public health, welfare, and the environment. EPA will review deliverables to assess the likelihood that the project will achieve its goals and that its performance requirements have been met. Acceptance of deliverables by EPA does not relieve the contractor of responsibility for the adequacy of the deliverables.

The contractor shall adhere to all procedures established for Confidential Business Information (CBI) in both the ARCS contract and by Region 5, U.S. EPA.

Project Closeout

At the completion of the work assignment, the contractor shall perform all necessary project closeout activities as specified in the contract. These activities may include closing out any subcontracts, indexing and consolidating project records and files as required in Paragraph 0.4 above, and providing a technical and financial closeout report to EPA.

Task 1 Project Planning and Support

The purpose of this task is to determine how the project will be managed and controlled. The following activities shall be performed as part of the project planning task:

1.1 Project Planning. This task includes efforts related to project initiation.

1.1.1 Attend Kickoff Meeting. The contractor shall contact the RPM within 5 calendar days after receipt of the work assignment to schedule the kickoff meeting. The contractor shall attend a kickoff meeting to be held at the USEPA Region 5 Office in Chicago, Illinois after receipt of the work assignment. It is anticipated that 1 - 2 contractor personnel will attend the kickoff meeting.

1.1.2 Conduct Site Visit. If contractor personnel are not already familiar with the site, the contractor shall conduct a one day site visit with the USEPA WAM/RPM and the Illinois EPA project manager during the project planning phase to develop a conceptual understanding of the site. It is anticipated that 1 - 2 contractor personnel will attend the site visit.

1.1.3 Evaluate Existing Information.

SEE LATER TASKS

1.1.4 Project Work Plan

1.1.4.1 Develop Project Work Plan. The contractor shall prepare and submit a Project Work Plan within 30 calendar days after receipt of the work assignment (WA). The contractor shall use information from the USEPA-approved PRP Work Plan, appropriate USEPA guidance, and technical direction provided by the USEPA WAM/RPM as the basis for preparing the Work Plan. The contractor shall submit one copy of the work plan to the Contracting Officer (CO), Project Officer (PO) and Work Assignment Manager (WAM).

Develop Narrative. The Project Work Plan shall include a comprehensive description of project tasks, the procedures to accomplish them, project documentation, and project schedule. The contractor shall use their quality assurance/quality control (QA/QC) systems and procedures to assure that the work plan and other deliverables are of professional quality requiring only minor revisions. Specifically, the Work Plan shall include the following:

- Identification of project elements. Output of this task will be a detailed work breakdown structure of the project.
- The contractor's technical approach to each task to be performed, including a detailed description of each task; the assumptions used; any information to be produced during and at the conclusion of each task; and a description of the work products that will be submitted to USEPA. Information shall be presented in a sequence consistent with SOW.
- A schedule with specific dates for completion of each required activity and submission of each deliverable required by the SOW. This schedule shall also include information regarding timing, initiation, and completion of all critical path milestones for each activity and deliverable and the expected review time for USEPA.
- A list of key contractor personnel providing support on the work assignment.

1.1.4.2 Prepare Revised Work Plan (if necessary)

1.1.4.2.1 Attend Fact Finding/Negotiation Meeting. The contractor shall attend a Work Plan fact finding/negotiation meeting at the Region 5 office. USEPA and the Contractor will discuss and agree upon the final technical approach and costs required to accomplish the tasks outlined in the SOW.

1.1.4.2.2 Prepare & Submit Revised Work Plan. The contractor shall prepare and submit a revised work plan incorporating the agreements made in the fact finding/negotiation meeting.

1.2 Project Management

The contractor shall perform general work assignment management including management and tracking of costs, preparation of Monthly Progress Reports, attendance at project meetings, and preparation and submittal of invoices. It is anticipated that the period of performance for this project is from July 1997 through February 1998.

1.2.1 Prepare Monthly Status Reports. The contractor shall prepare monthly progress reports in accordance with the requirements under the contract. The contractor shall document the technical progress and status of each task in the WBS for the reporting period in accordance with contract requirements. The contractor shall report costs and level of effort (by P-level) for the reporting period as well as cumulative amounts expended to date.

1.2.2 Meetings. The contractor shall participate in progress meetings during the course of the work assignment. For budgeting purposes, the contractor shall assume a total of 2 meetings, with 2 contractor personnel in attendance.

1.2.3 Work Assignment Closeout. The contractor shall perform the necessary activities to closeout the work assignment in accordance with contract requirements.

1.2.3.1 Package and Return Documents to Government. The contractor shall box up all draft and final versions of all deliverables and raw data information and send them to the USEPA Records Center or as directed in the Work Assignment Closeout Notification (WACN).

1.2.3.2 Prepare Work Assignment Closeout Report (WACR). The contractor shall prepare and submit a WACR as directed in the WACN.

Task 2 Acquisition Of Existing Information

The contractor shall locate all existing technical and Potentially Responsible Party (PRP) information concerning the Sauget Area 1 and Sauget Area 2 sites held by the Agencies and Municipalities listed below and any others suggested by U.S. EPA. The contractor shall develop a log of all sources of information which they locate. The contractor shall copy for the U.S. EPA files all technical data and the associated information which they judge necessary for completion of this work assignment. The contractor shall use their best professional judgement and frequent contact with U.S. EPA in deciding what files to copy for U.S. EPA.

2.1 USEPA Region 5 Offices. USEPA will help the contractor obtain site information from the following offices, located in Chicago, Illinois:

Superfund Division
Waste, Toxics and Pesticides Division
Water Division

2.2 IEPA Offices: IEPA will help the contractor obtain site information from the following offices, located in Springfield and Collinsville, Illinois:

Superfund Program
RCRA Program
Water Programs

2.3. U.S. EPA will help the contractor obtain any siteinformation available from the following Federal Agencies which has not already been obtained in preparation of previous reports on the sites:

U.S. Fish and Wildlife Service
U.S. Food and Drug Administration (fish study)
U.S. Department of Agriculture (air photos)
U.S. Army Corps of Engineers (air photos)

2.4 IEPA and/or the USEPA will help the contractor obtain any site information available from the following State and Local Agencies which has not already been obtained in preparation of previous reports on the sites:

Illinois Department of Public Health
Illinois Department of Transportation (air photos)
St. Claire County
Village of Sauget & Sauget Fire Department
Village of Cahokia & Cahokia Fire Department
East Side Health Department

Task 3 Property Ownership Tables and Maps

The contractor shall complete deliverables for this task for Sauget Area 1 and Sauget Area 2 separately.

The contractor shall perform a search to establish current property ownership for each subunit of these sites and also supply names and addresses of continuous property owners. A map keyed to the table shall also be developed and delievered for each if the two sites. The contractor shall provide three (3) copies of the property ownership tables and maps.

Task 4 Technical Data Summary Tables and Maps

The contractor shall organize and evaluate existing technical data for each subunit of the sites and for groundwater at each site. The contractor shall evaluate the useability of the data.

4.1 Draft Data Summary Tables. The Contractor shall develop and deliver separate Technical Data Summary Tables for Sauget Area 1 and Area 2 that accurately establish the site characteristics of each subunit, to the extent that this is possible using existing data. In accordance with the schedule developed in the project work plan, the contractor shall submit two sets of draft Data Summary Tables, one for Sauget Area 1 and one for Sauget Area 2, each of which includes the items listed below. The deliverables may be in table or database format, whichever the Contractor finds more suitable. The contractor shall include a text discussion of the data only to the degree the Contractor finds it necessary to explain the data to U.S. EPA, or as requested by U.S. EPA.

- Data Sources. The contractor shall itemize the sources of data used in this report.
- Nature and Extent of Contamination. The contractor shall itemize the nature and extent of contamination for each subunit of each site, including groundwater.
  - Contaminant Sources
  - Contaminant Distribution and Trends
- Containment & Integrity. The contractor shall describe the current type of containment for each subunit, if any, and describe the status of its integrity, if known.

4.2 Draft Maps. The contractor shall develop draft site maps for Sauget Area 1 and Sauget Area 2 which summarize known information for each site, including:

- Location of subunits.
- Sample locations
- Contaminants & contaminant levels

4.3. Final Data Summary Tables and Maps. After EPA review of the draft Data Summary Tables and Maps, the contractor shall incorporate EPA comments and submit the final Tables and Maps.

Task 5 Data Gaps Memoranda

The Contractor shall develop and deliver a memorandum for each of the two sites which summarizes gaps in technical data which they have identified by summarizing existing data.

Task 6 PRP Records Complilation

6.1 PRP Files Setup

The contractor shall review all pertinent governmental records in Federal, State and local files relevant to a PRP search as referenced in section 3.1.1, "Agency Record Collection and File Review" in the Potentially Responsible Party Search Manual (OSWER Directive 9834.6). Relevant records may include correspondence, hazardous waste manifests, technical data and reports, permits, complaints, investigations, fire department chemical reports, litigation files, bankruptcy files, and responses to 104(e) information requests. The contractor shall make copies of all such documents which are not already present in the U.S. EPA Superfund files for the Sauget sites and organize all files in PRP-specific folders after sequential numbering using either a Bates (automatic numbering) stamp or other unique numbering system. In addition, the contractor shall create an index for those items pertaining to (1) several PRPs or (2) discussing subjects of a general nature. Material specific to one PRP shall be filed with other documents pertaining to that PRP thus creating a liability file of evidence for each PRP.

6.2 PRP Database

After the title search and records compilation are completed, the contractor shall compile a PRP Database, usable by U.S. EPA, which summarizes the existing PRP information and any additional PRP information gathered during Task 3. The PRP Database shall include the information listed in Attachment 3 to this Scope of Work and any other information as directed by U.S. EPA. The PRP Database shall be submitted in draft form for review and comment by U.S. EPA (in a format to be coordinated with the U.S. EPA WAM) and resubmitted in final format after incorporation of U.S. EPA comments.

6.3 PRP Waste Disposal Personnel List

From existing information in the PRP files, the contractor shall compile a list of all persons linked to waste disposal for that PRP, including names, addresses, telephone numbers (when known), company position, involvement with waste disposal and any additional information as requested by U.S. EPA. The PRP Personnel List shall be submitted in draft form for review and comment by U.S. EPA and resubmitted in final format after incorporation of U.S. EPA comments.

ATTACHMENTS

Attachment 1. Summary of Major Submittals
Attachment 2. Regulation and Guidance Documents
Attachment 3. Outline of PRP Database

Attachment 1
Summary of Major Submittals

TASK	DELIVERABLE	NO. OF COPIES	DUE DATE (calendar days)
1.1.4.1	Project Work Plan	2 (6)	30 days after initiation of work assignment (WA)
1.1.4.2	Revised Project Work Plan	2	15 days after receipt of comments
3	Propety Ownership Tables/Maps	3 2 original 5 7 copies	60 days after Work Plan approval
4.1/4.2	Draft Technical Data Tables/Maps	~~3~~ 6	90 days after Work Plan approval
6.2/6.3	Draft PRP Database & Personnel List	2	90 days after Work Plan approval
4.3	Final Technical Data Tables/Maps	~~3~~ 6	30 days after receipt of comments on draft Data Summary Report
6.2/6.3	Final PRP Database & Personnel List	~~3~~ 5	30 days after receipt of comments
1.2.3.2	Work Assignment Closeout Report	3	(#) days after receipt of Work Assignment Completion Notification
	Work Assignment Completion Report	1	as directed in Work Assignment Closeout Notification

Attachment 2
Regulations and Guidance Documents

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the RI/FS process:

1. American National Standards Practices for Respiratory Protection. American National Standards Institute Z88.2-1980, March 11, 1981.
2. ARCS Construction Contract Modification Procedures September 89, OERR Directive 9355.5-01/FS.
3. CERCLA Compliance with Other Laws Manual, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, August 1988 (DRAFT), OSWER Directive No. 9234.1-01 and -02.
4. Community Relations in Superfund — A Handbook, U.S. EPA, Office of Emergency and Remedial Response, June 1988, OSWER Directive No. 9230.0-3B.
5. A Compendium of Superfund Field Operations Methods, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.
6. Construction Quality Assurance for Hazardous Waste Land Disposal Facilities, U.S. EPA, Office of Solid Waste and Emergency Response, October 1986, OSWER Directive No. 9472.003.
7. Contractor Requirements for the Control and Security of RCRA Confidential Business Information, March 1984.
8. Data Quality Objectives for Remedial Response Activities, U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.
9. Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, U.S. EPA Region IV, Environmental Services Division, April 1, 1986 (revised periodically).
10. EPA NEIC Policies and Procedures Manual, EPA-330/9-78-001-R, May 1978, revised November 1984.
11. Federal Acquisition Regulation, Washington, DC: U.S. Government Printing Office (revised periodically).
12. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive NO. 9355.3-01.
13. Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potential Responsible Parties, U.S. EPA Office of Emergency and Remedial Response, EPA/540/G-90/001, April 1990.
14. Guidance on Expediting Remedial Design and Remedial Actions, EPA/540/G-90/006, August 1990.
15. Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites, U.S. EPA Office of Emergency and Remedial Response (DRAFT), OSWER Directive No. 9283.1-2.
16. Guide for Conducting Treatability Studies Under CERCLA, U.S. EPA, Office of Emergency and Remedial Response, Prepublication version.
17. Guide to Management of Investigation-Derived Wastes, U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9345.3-03FS, January 1992.
18. Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Research and Development, Cincinnati, OH, QAMS-004/80, December 29, 1980.
19. Health and Safety Requirements of Employees Employed in Field Activities, U.S. EPA, Office of Emergency and Remedial Response, July 12, 1982, EPA Order No. 1440.2.
20. Interim Guidance on Compliance with Applicable of Relevant and Appropriate Requirements, U.S. EPA, Office of Emergency and Remedial Response, July 9, 1987, OSWER Directive No. 9234.0-05.
21. Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.
22. Methods for Evaluating the Attainment of Cleanup Standards: Vol. 1, Soils and Solid Media, February 1989, EPA 23/02-89-042; vol. 2, Ground water (Jul 1992).
23. National Oil and Hazardous Substances Pollution Contingency Plan; Final Rule, Federal Register 40 CFR Part 300, March 8, 1990.
24. NIOSH Manual of Analytical Methods, 2nd edition. Volumes I-VII for the 3rd edition, Volumes I and II, National Institute of Occupational Safety and Health.
25. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, National Institute of Occupational Safety and Health/Occupational Health and Safety Administration/United States Coast Guard/Environmental Protection Agency, October 1985.
26. Permits and Permit Equivalency Processes for CERCLA On-Site Response Actions, February 19, 1992, OSWER Directive 9355.7-03.

27. Procedure for Planning and Implementing Off-Site Response Actions, Federal Register, Volume 50, Number 214, November 1985, pages 45933-45937.
28. Procedures for Completion and Deletion of NPL Sites, U.S. EPA, Office of Emergency and Remedial Response, April 1989, OSWER Directive No. 9320.2-3A.
29. Quality in the Constructed Project: A Guideline for Owners, Designers and Constructors, Volume 1, Preliminary Edition for Trial Use and Comment, American Society of Civil Engineers, May 1988.
30. Remedial Design and Remedial Action Handbook, U.S. EPA, Office of Emergency and Remedial Response, June 1995, OSWER Directive No. 9355.5-22.
31. Revision of Policy Regarding Superfund Project Assignments, OSWER Directive No. 9242.3-08, December 10, 1991. [Guidance, p. 2-2]
32. Scoping the Remedial Design (Fact Sheet), February 1995, OSWER Publ. 9355-5-21 FS.
33. Standard Operating Safety Guides, U.S. EPA, Office of Emergency and Remedial Response, November 1984.
34. Standards for the Construction Industry, Code of Federal Regulations, Title 29, Part 1926, Occupational Health and Safety Administration.
35. Standards for General Industry, Code of Federal Regulations, Title 29, Part 1910, Occupational Health and Safety Administration.
36. Structure and Components of 5-Year Reviews, OSWER Directive No. 9355.7-02, May 23, 1991. [Guidance, p. 3-5]
37. Superfund Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties, April 1990, EPA/540/G-90/001.
38. Superfund Remedial Design and Remedial Action Guidance, U.S. EPA, Office of Emergency and Remedial Response, June 1986, OSWER Directive No. 9355.0-4A.
39. Superfund Response Action Contracts (Fact Sheet), May 1993, OSWER Publ. 9242.2-08FS.
40. TLVs-Threshold Limit Values and Biological Exposure Indices for 1987-88, American Conference of Governmental Industrial Hygienists.
41. Treatability Studies Under CERCLA, Final. U.S. EPA, Office of Solid Waste and Emergency Response, EPA/540/R-92/071a, October 1992.
42. USEPA Contract Laboratory Program Statement of Work for Inorganic Analysis, U.S. EPA, Office of Emergency and Remedial Response, July 1988.
43. USEPA Contract Laboratory Program Statement of Work for Organic Analysis, U.S. EPA, Office of Emergency and Remedial Response, February 1988.
44. User's Guide to the EPA Contract Laboratory Program, U.S. EPA, Sample Management Office, August 1982.
45. Value Engineering (Fact Sheet), U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9355.5-03FS, May 1990.

ATTACHMENT 3

INFORMATION TO BE INCLUDED IN PRP DATABASE

Corporate address

Facility address

Type of PRP

For owners/operators:

* time period during which the person owned and/or operated the facility

* whether the disposal of hazardous substances occurred during that period

* type of activity of the owner/operator (e.g., individual, manufacturing facility for ..., etc.)

For "generators" (i.e., persons who arranged for either the treatment or disposal of the hazardous substances):

* type of facility

* major products produced

* hazardous substances produced or stored, including volumes (if available)

* substances disposed of at the site, including which subunit

* hazardous or potentially hazardous substances disposed of at the site, including which subunit

* time period of disposal

For transporters

* nature of the substances and volumes (if available)

* linking evidence to generators

* whether the transporter selected the site for disposal or treatment

For all PRPs identify (For complex situations, the information may be submitted in attached text rather than in the database itself):

* actions taken against the PRP or agreements reached with the PRP by U.S. EPA or IEPA

* financial viability (e.g., bankruptcy, corporations that are defunct or dissolved, and individuals who have died, with a description of the status of their estate. If a record is found of a bankruptcy action occurring within the previous 24 months, notify the WAM immediately.)

* secondary liability (e.g., corporate successors, parent corporations, subsidiary corporations, and individual officers, directors, shareholders and any other employees with management or decision-making responsibilities within these corporations.)

* evidence assessment according to the following catagories:

1) Definite Linking Evidence -- Direct evidence support the liability statements of Section 107 of CERCLA.

2) Probable Linking Evidence -- Strong circumstantial evidence, based on available documents, links a company to the site, despite a written denial of involvement, using the following criteria:

-- the company admits sending, or the evidence suggests the company sent hazardous or non-hazardous waste to the site between the dates of operation.

-- the company admits or documents demonstrate that the company generated hazardous waste and that they had no other disposal location besides the site between the dates of operation.

-- the company is or has been a RCRA generator.

-- the company waste stream contains hazardous wastes or substances.

-- the company was the main customer at the site.

3) Little or No Evidence -- Companies in this category are ones that are RCRA generators or the company waste stream contains hazardous waste substances but the evidence, either circumstantial or otherwise, fails to support statements of liability from Section 107 of CERCLA

-- companies that do not generate hazardous waste in the normal course of their business activities such as construction companies, churches, or restaurants.

-- companies placed on the PRP mailing list as a case of mistaken identity.

4) No Determination -- Companies in this category are those too difficult to categorize elsewhere above. Consult the WAM before placing a company in this category.